

Medical Board of California - Division of Licensing
Approved Postgraduate Training
Initial Statement of Reasons

Hearing Date: No proposed hearing date, unless one is requested

Subject Matter of Proposed Regulations: Approved Postgraduate Training

(1) Section(s) Affected: Title 16, California Code of Regulations, Section 1321(a) and (c)

Specific Purpose of each adoption, amendment, or repeal:

- (a) The specific purpose of this amendment is to delete the incorrect reference to the Coordinating Council on Medical Education of the Canadian Medical Association and replace it with the correct reference.
- (b) The specific purpose of this amendment is to identify the nature of the authorization letter that is issued.

Factual Basis/Rationale

- (a) The reference to the Coordinating Council on Medical Education of the Canadian Medical Association is incorrect since this organization reviews and approves medical education in Canada. The authority that reviews and approves postgraduate training programs in Canada is The Royal College of Physicians and Surgeons of Canada (RCPSC). As such, Section 1321(a) should be amended reflect the correct name.
- (b) Business and Professions Code Section 2102 (c) requires international medical school graduates to satisfy certain prerequisites before they enter postgraduate training programs in California. Training program directors need proof that applicants applying to their programs have satisfied those statutory prerequisites before training commences. As a practical issue, staff issues qualified applicants a Postgraduate Training Authorization Letter (PTAL). Applicants distribute their PTAL to training program directors to confirm their eligibility to begin training in California. This simple process facilitates qualified candidates' consideration for training positions in California and precludes ineligible candidates from engaging in the unlicensed practice of medicine. The proposed amendment to Section 1321(c) would clarify the nature of the authorization letter that is granted to international medical school graduates.

Underlying Data

Technical, theoretical or empirical studies or reports relied upon (if any): None

Business Impact

This regulation will not have a significant adverse economic impact on businesses.

Specific Technologies or Equipment

This regulation does not mandate the use of specific technologies or equipment.

Consideration of Alternatives

No reasonable alternative to the regulation would be either more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons than the proposed regulation.

Set forth below are the alternatives which were considered and the reasons each alternative was rejected:

1. Take no action – not a feasible alternative for the Board because the current version of Section 1321(a) contains an inaccurate reference to the Royal College of Physicians and Surgeons of Canada.
2. Take no action – not a feasible alternative for the Board because the current version of Section 1321 (c) does not reference the title of the authorization letter currently issued to international medical graduates and does not codify an existing practice.